

EXHIBIT B

John Eddie Williams, Jr. (pro hac vice)
Brian Abramson (pro hac vice)
Margret Lecoche (pro hac vice)
Walt Cubberly (SBN 325163)
Batami Baskin (pro hac vice)
Myles Shaw (pro hac vice)
Joseph C. Melugin (SBN 279439)

WILLIAMS HART & BOUNDAS, LLP

8441 Gulf Freeway, Suite 600
Houston, Texas 77017-5051
Telephone: (713) 230-2200
Facsimile: (713) 643-6226
Email: jwilliams@whlaw.com
Email: babramson@whlaw.com
Email: mlecoche@whlaw.com
Email: wcubberly@whlaw.com
Email: bbaskin@whlaw.com
Email: mshaw@whlaw.com
Email: jmelugin@whlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**PLAINTIFF WHB 1486'S REPONSES TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

This Document Relates to:

WHB 1486 v. Uber Technologies, Inc., et al.
Case No. 3:24-cv-04803

PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**
RESPONDING PARTY: **PLAINTIFF WHB 1486**

1 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
 2 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
 3 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
 4 remotely connected to the ALLEGED INCIDENT.

5 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
 6 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
 7 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
 8 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
 9 the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-
 10 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
 11 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
 12 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
 13 privacy interests, disclosure of highly confidential and sensitive medical information should only be
 14 compelled where the documents concern those specific conditions the litigant has put directly at issue.

15 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
 16 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
 17 privilege.

18 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
 19 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

20 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

21 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
 22 contains and discloses the requested information.

23 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 24 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 25 obtain more responsive, nonprivileged, relevant information.

26 **INTERROGATORY NO. 7:**

27 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 28 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR

responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 7:

Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

Plaintiff has become distrustful of taking Uber and takes public transit when she can. She has bottled up her feelings as a result of the assault.

If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this response at a later time should she obtain more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 8:

Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as a result of the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 8:

To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose expert discovery at the time specified by the Court.

Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client privilege and/or the attorney work-product doctrine.

To the extent that the Interrogatory is limited to Plaintiff's damages incurred to date, Plaintiff responds, subject to and without waiving her specific and general objections, as follows:

None to date.

If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this response at a later time should she obtain more responsive, nonprivileged, relevant information.

RACHEL B. ABRAMS (Cal Bar No. 209316)
ADAM B. WOLF (Cal Bar No. 215914)
Peiffer Wolf Carr Kane Conway & Wise, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: 415.766.3544
Facsimile: 415.840.9435
Email: rabrums@peifferwolf.com
Email: awolf@peifferwolf.com

TIFFANY R. ELLIS (*Admitted Pro Hac Vice*)
Peiffer Wolf Carr Kane Conway & Wise, LLP
15 E. Baltimore Ave
Detroit, MI 48202
Telephone: (313) 572-4727
Facsimile: (415) 840-9435
Email: tellis@peifferwolf.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**PLAINTIFF [REDACTED] RESPONSE
TO DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

This Document Relates to:

[REDACTED] v. *Uber Technologies, Inc., et al.*,
3:23-cv-06708

PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**
RESPONDING PARTY: **PLAINTIFF [REDACTED]**

1 mental and physical health;

- 2 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
3 replaying the events of the Alleged Incident, and incontrollable panic attacks experienced for
4 months following the Alleged Incident;
- 5 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
6 and to this day;
- 7 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
8 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
9 whom she is familiar and comfortable; and
- 10 - Out of pocket costs and additional time management needed to ensure transportation outside of
11 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.

12 If Defendants believe further data is relevant and subject to discovery, Plaintiff is willing to confer
13 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
14 recall more responsive, nonprivileged, relevant information.

15 **INTERROGATORY NO. 4:**

16 For each INJURY identified in response to Interrogatory No. 3, identify every symptom, condition,
17 OR manifestation that YOU believe YOU have experienced as a result of that INJURY AND when YOU
18 first experienced each symptom, condition, OR manifestation, INCLUDING whether YOU ever
19 experienced that symptom, condition, OR manifestation before the ALLEGED INCIDENT.

20 **RESPONSE TO INTERROGATORY NO. 4:**

21 Plaintiff objects to Interrogatory No. 4 to the extent that it requires a legal conclusion and/or the
22 disclosure of information that is protected from disclosure by the attorney-client privilege and/or the
23 attorney work-product doctrine.

24 Plaintiff further objects to the extent that this Request seeks, prematurely, expert materials and/or
25 opinions, as doing so impermissibly intrudes upon her counsel's work product.

26 Plaintiff further objects that case specific discovery has just begun, and as such this request may
27 be premature.

28 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

1 The Alleged Incident has caused Plaintiff to experience the following symptoms:

2 The Alleged Incident has caused Plaintiff to experience the following:

- 3 - An overwhelming feeling of humiliation, being robbed of personal dignity and safety, and feeling
- 4 violated in the immediate aftermath of the Alleged Incident and to this day;
- 5 - Symptoms of anxiety, including sleep disturbances and paranoia since the Alleged Incident and to
- 6 this day.
- 7 - Overwhelming fear, since the date of the Alleged Incident and to this day;
- 8 - Interrupted sleep and overwhelming fear of the dark, flashbacks to the Alleged Incident and the
- 9 dark backseat of the vehicle of the Driver who perpetrated the assault during the Alleged Incident.
- 10 Plaintiff has to sleep with a night light to this day and had to share a room with a family member
- 11 for months following the Alleged Incident due to her fear of the dark, flashbacks, and the effects
- 12 of same;
- 13 - Abrasions and scratches on Plaintiff's back, bruises on Plaintiff's arm, irritation in Plaintiff's
- 14 cervix, immediately following the Alleged Incident;
- 15 - Undergoing a SANE exam, or sexual assault (rape) kit, including a general medical exam and
- 16 medical forensic exam, the collection of oral, buccal, anal, external genital, and vaginal swabs,
- 17 collection of vaginal aspirate, urine sample, and Plaintiff's undergarments, pregnancy test,
- 18 administration of Ceftriaxone injection to prevent Gonorrhea, a Doxycycline prescription to
- 19 prevent Chlamydia, a Metronidazole prescription to prevent Trichomoniasis, a Levonorgestrel
- 20 prescription to prevent pregnancy, and a Dolutegravir & Emtricitabine prescription to prevent HIV
- 21 immediately following the Alleged Incident;
- 22 - Feeling of Plaintiff's thoughts being consumed by the Driver who perpetrated the Alleged Incident
- 23 and the sexual assault, since the Alleged Incident and to this day;
- 24 - Feeling of embarrassment in front of Plaintiff's flight attendant training class who found out about
- 25 the Alleged Incident immediately after the Alleged Incident occurred the day following the
- 26 Alleged Incident;
- 27 - Inability to graduate from flight attendant training at Mesa Airlines on November 16, 2023, the
- 28 day following the Alleged Incident, because of the effects of the Alleged Incident on Plaintiff's

1 mental and physical health;

- 2 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
3 replaying the events of the Alleged Incident, and incontrollable panic attacks experienced for
4 months following the Alleged Incident;
- 5 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
6 and to this day;
- 7 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
8 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
9 whom she is familiar and comfortable; and
- 10 - Out of pocket costs and additional time management needed to ensure transportation outside of
11 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.

12 If Defendants believe further data is relevant and subject to production, Plaintiff is willing to confer
13 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
14 recall more responsive, nonprivileged, relevant information.

15 **INTERROGATORY NO. 5:**

16 If ANY MEDICAL PRACTITIONER has advised YOU that YOU may require future OR
17 additional treatment for ANY INJURIES that YOU attribute to the ALLEGED INCIDENT, state, for each
18 INJURY:

- 19 a. The name, address, AND phone number of the MEDICAL PRACTITIONER who advised
20 YOU;
- 21 b. The illness, condition, OR INJURY for which future treatment was discussed; AND
- 22 c. The nature, duration, AND estimated cost of the discussed future treatment.

23 **RESPONSE TO INTERROGATORY NO. 5:**

24 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

25 Plaintiff has received discharge instructions and notes regarding general follow-ups to the medical
26 forensic examination completed on November 15, 2023 and future care advice from the following medical
27 practitioners:

- 28 - Forensic Nurse Examiner Unit, Jessica Weaver, RN, Honor Health Medical Center, 7400

1 or any other mental health treatment related to the effects of the Alleged Incident. Plaintiff directs
 2 Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which contains and discloses the
 3 requested information.

4 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 5 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 6 obtain more responsive, nonprivileged, relevant information.

7 **INTERROGATORY NO. 7:**

8 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 9 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
 10 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

11 **RESPONSE TO INTERROGATORY NO. 7:**

12 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

13 The Alleged Incident has affected Plaintiff in the following ways:

- 14 - Symptoms of anxiety, including sleep disturbances and paranoia;
- 15 - Overwhelming fear in general;
- 16 - Interrupted sleep and overwhelming fear of the dark, flashbacks to the Alleged Incident and the
 17 dark backseat of the vehicle of the Driver who perpetrated the assault during the Alleged Incident.
 18 Plaintiff has to sleep with a night light to this day and had to share a room with a family member
 19 for months following the Alleged Incident due to her fear of the dark, flashbacks, and the effects
 20 of same;
- 21 - Plaintiff had to suspend her graduation from flight attendant training with Mesa Airlines on
 22 November 16, 2023 and return to stay with her parents because of the effects of the Alleged
 23 Incident on Plaintiff's mental and physical health. She was not able to complete the program and
 24 had to switch careers and undergo other specialized education and training;
- 25 - Feeling of Plaintiff's thoughts being consumed by the Driver who perpetrated the Alleged Incident
 26 and the sexual assault, since the Alleged Incident and to this day;
- 27 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
 28 replaying the events of the Alleged Incident, and uncontrollable panic attacks experienced for

1 months following the Alleged Incident;

- 2 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
3 and to this day;
- 4 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
5 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
6 whom she is familiar and comfortable; and
- 7 - Out of pocket costs and additional time management needed to ensure transportation outside of
8 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.
- 9 - Modified ability for Plaintiff to be alone in public spaces, interacting with strangers, engaging
10 socially with individuals and crowds, interacting with individuals in a friendly or romantic manner,
11 socializing, interacting with friends and family, entering rideshare vehicles or public transportation
12 alone, and pursuing employment and education opportunities.

13 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
14 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
15 response at a later time should she obtain more responsive, nonprivileged, relevant information.

16 **INTERROGATORY NO. 8:**

17 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
18 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
19 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
20 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
21 a result of the ALLEGED INCIDENT.

22 **RESPONSE TO INTERROGATORY NO. 8:**

23 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
24 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
25 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
26 expert discovery at the time specified by the Court.

27 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
28 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client

RACHEL B. ABRAMS (Cal Bar No. 209316)
ADAM B. WOLF (Cal Bar No. 215914)
Peiffer Wolf Carr Kane Conway & Wise, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: 415.766.3544
Facsimile: 415.840.9435
Email: rabrums@peifferwolf.com
Email: awolf@peifferwolf.com

TIFFANY R. ELLIS (*Admitted Pro Hac Vice*)
Peiffer Wolf Carr Kane Conway & Wise, LLP
15 E. Baltimore Ave
Detroit, MI 48202
Telephone: (313) 572-4727
Facsimile: (415) 840-9435
Email: tellis@peifferwolf.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**PLAINTIFF A.R.'S REPOSE TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

This Document Relates to:

A.R. v. Uber Technologies, Inc., et al., 3:24-cv-
07821

PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
I.L.C, AND RASIER-CA, I.L.C**
RESPONDING PARTY: **PLAINTIFF A.R.**

Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even remotely connected to the ALLEGED INCIDENT.

Thus, to the extent this Request seeks medical information regarding matters not directly relevant or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy. *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these privacy interests, disclosure of highly confidential and sensitive medical information should only be compelled where the documents concern those specific conditions the litigant has put directly at issue.

Plaintiff objects to the extent that it seeks the disclosure of information that would be protected from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient privilege.

Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which contains and discloses the requested information.

If Defendants believe further information is relevant and subject to production, Plaintiff is willing to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 7:

Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life, INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 7:

1 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

2 The Alleged Incident has affected Plaintiff in the following ways:

- 3 - An overwhelming feeling of embarrassment, confusion, anger, and fear in the immediate aftermath
4 of the Alleged Incident;
- 5 - Symptoms of anxiety in public spaces, experienced since the date of the Alleged Incident to this
6 day;
- 7 - Symptoms of anxiety in general, which have been exacerbated since the date of the Alleged
8 Incident and to this day;
- 9 - Symptoms of depression, which have been exacerbated since the date of the Alleged Incident and
10 to this day;
- 11 - Fear and hypervigilance when taking Uber or other rideshare services in general, experienced since
12 the date of the Alleged Incident and to this day;
- 13 - Fear and hypervigilance when taking Uber or other rideshare services unaccompanied,
14 experienced since the date of the Alleged Incident and to this day;
- 15 - Fear, symptoms of anxiety, and hypervigilance when taking Uber or other rideshare services and
16 the Driver is not a woman, experienced since the date of the Alleged Incident and to this day;
- 17 - Fear, symptoms of anxiety, and panic when taking Uber or other rideshare services and the Driver
18 is driving fast, experienced since the date of the Alleged Incident and to this day;
- 19 - Feeling of dissociation related to the Alleged Incident, experienced for months following the
20 Alleged Incident;
- 21 - Sleep disturbances and insomnia, experienced for months following the Alleged Incident;
- 22 - Difficulty focusing on work and daily tasks, experienced for months following the Alleged
23 Incident;
- 24 - Symptoms of social anxiety and stress that have affected Plaintiff's ability to make new social
25 connections and participate in daily activities, experienced since the date of the Alleged Incident
26 and to this day;
- 27 - Fear, nervousness, and symptoms of anxiety when Plaintiff is around strangers, walking in a
28 neighborhood that isn't heavily populated, walking down empty streets, experienced since the date

1 of the Alleged Incident and to this day;

- 2 - Decreased motivation for activities, isolation, and appetite since the date of the Alleged Incident
- 3 and to this day;
- 4 - Spending more time in bed, inability to follow daily routine, and feeling of numbness, for weeks
- 5 following the date of the Alleged Incident;
- 6 - Other symptoms related to generalized anxiety disorder and major depressive disorder,
- 7 exacerbated since the date of the Alleged Incident and to this day; and
- 8 - General disruption of Plaintiff's daily routine, including sleep, interacting with friends, family,
- 9 romantic relationships, and strangers, socializing, and being alone in public spaces, experienced
- 10 since the date of the Alleged Incident and to this day.

11 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 12 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
 13 response at a later time should she obtain more responsive, nonprivileged, relevant information.

14 **INTERROGATORY NO. 8:**

15 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
 16 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
 17 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
 18 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
 19 a result of the ALLEGED INCIDENT.

20 **RESPONSE TO INTERROGATORY NO. 8:**

21 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
 22 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
 23 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
 24 expert discovery at the time specified by the Court.

25 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
 26 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client
 27 privilege and/or the attorney work-product doctrine.

28 In lieu of responding regarding any written documents in her custody, possession, or control,

1 M. Kevin Queenan (TX SBN 16427150)
2 *Appearance pro hac vice*
3 Carlos Lopez (TX SBN 24083414)
4 *Appearance pro hac vice*
5 **QUEENAN LAW FIRM P.C.**
6 731 Station Drive
7 Arlington, Texas 76015
8 Phone: (817) 635-3333
9 Facsimile: (817) 635-4444
10 E-mail: service@queenanlaw.com
11 E-mail: carlos@queenanlaw.com
12 *Attorneys for Plaintiff Jane Doe QLF 001*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 IN RE: UBER TECHNOLOGIES, INC.
11 PASSENGER SEXUAL ASSAULT
12 LITIGATION

MDL No. 3084 CRB

**PLAINTIFF JANE DOE QLF 001'S
RESPONSE TO DEFENDANTS UBER
TECHNOLOGIES, INC.'S, RASIER, LLC'S,
AND RASIER-CA, LLC'S
INTERROGATORIES, SET ONE**

13 This Document Relates to:

14 *Jane Doe QLF 001 v. Uber Technologies, Inc.,*
15 *et al.; C.A. No. 3:24-cv-08783-CRB*

16 PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,**
17 **LLC, AND RASIER-CA, LLC**

18 RESPONDING PARTY: **PLAINTIFF JANE DOE QLF 001**

19 Plaintiff Jane Doe QLF 001 (hereinafter, "Plaintiff") hereby objects and responds to Defendants
20 Uber Technologies, Inc.'s, Rasier, LLC's, and Rasier-CA, LLC's Interrogatories, Set One, as follows:

21 **PRELIMINARY STATEMENT**

22 Plaintiff has not completed discovery; the investigation of the facts, witnesses, or documents; the
23 analysis of available information; or the preparation for trial in this case. These responses, while based on
24 diligent inquiry and investigation by Plaintiff, reflect only the current state of Plaintiff's knowledge,
25 understanding, and belief, based upon the information reasonably available to the Plaintiff at this time. As
26 this action proceeds and further investigation and discovery are conducted, additional or different facts
27 and information could be revealed to Plaintiff. Moreover, Plaintiff anticipates that the Propounding Parties
28 may make legal or factual contentions presently unknown to and unforeseen by Plaintiff which may

Soto v. City of Concord, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these privacy interests, disclosure of highly confidential and sensitive medical information should only be compelled where the documents concern those specific conditions the litigant has put directly at issue.

Plaintiff objects to the extent that this interrogatory seeks the disclosure of information that would be protected from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient privilege.

Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has been disclosed in Plaintiff's FACT SHEET, and, thus, is cumulative and duplicative.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which contains and discloses the requested information.

If Defendants believe further information is relevant and subject to production, Plaintiff is willing to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 7:

Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life, INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 7:

Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

Since the incident, in general, my daily life has been inflicted with emotional distress which has resulted in a problematic periodic use of alcohol and drugs. Throughout my daily life I have bouts of depressed mood, sadness, discouragement, diminished confidence, restlessness, indecisiveness, low self-

1 esteem, irritability, increased appetite, poor concentration, fatigue, fearfulness, feeling overwhelmed,
2 worry, and anxiety. These symptoms have resulted in me having inconsistent sleep and thoughts of suicide
3 and self-harm. The symptoms have and continue to affect my personal relationships, interruption of my
4 daily routines at home and at work, and socializing with friends and family.

5 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
6 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
7 response at a later time should she obtain more responsive, nonprivileged, relevant information.

8 **INTERROGATORY NO. 8:**

9 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
10 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
11 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
12 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
13 a result of the ALLEGED INCIDENT.

14 **RESPONSE TO INTERROGATORY NO. 8:**

15 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out-
16 of-pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's
17 counsel's attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will
18 disclose expert discovery at the time specified by the Court.

19 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
20 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client
21 privilege and/or the attorney work-product doctrine.

22 To the extent that the Interrogatory is limited to Plaintiff's damages incurred to date, Plaintiff
23 responds, subject to and without waiving her specific and general objections, as follows:

24 In lieu of responding regarding any written documents in her custody, possession, or control,
25 Plaintiff directs Propounding Parties to the documents produced in response to Propounding Parties'
26 concurrently-served Requests for Production Nos. 4, 10, and 11.

27 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
28 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this

WAGSTAFF LAW FIRM

Sommer D. Luther, CO 35053
940 Lincoln Street
Denver, CO 80203
Tel: (303) 263-8949
Fax: (303) 376-6361
sluther@wagstafflawfirm.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

Honorable Charles R. Breyer

This Document Relates to:

JURY TRIAL DEMANDED

T.L v. Uber Technologies, Inc., et al.
No. 23-cv-9217

**PLAINTIFF T.L.'S REPOSE TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

PROPOUNDING PARTIES: DEFENDANTS UBER TECHNOLOGIES, INC., RASIER, LLC,
AND RASIER-CA, LLC

RESPONDING PARTY: PLAINTIFF T.L.

SET NO.: ONE (1)

1 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
2 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
3 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
4 remotely connected to the ALLEGED INCIDENT.

5 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
6 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
7 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
8 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
9 the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-
10 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
11 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
12 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
13 privacy interests, disclosure of highly confidential and sensitive medical information should only be
14 compelled where the documents concern those specific conditions the litigant has put directly at issue.

15 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
16 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
17 privilege.

18 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
19 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

20 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

21 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
22 contains and discloses the requested information.

23 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
24 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
25 obtain more responsive, nonprivileged, relevant information.

26 **INTERROGATORY NO. 7:**

27 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
28 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR

responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 7:

Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

The incident has had a profound impact on Plaintiff's life in ways that are difficult to fully document here. Plaintiff attempts to Respond to this Interrogatory by stating and responding as follows: The impact to Plaintiff includes but is not limited to the following: Plaintiff was out of work for a few days due to the incident. After the incident, she found it hard to look at herself in the mirror. She had trouble forcing herself to bathe because she was so disgusted. Plaintiff was paranoid and found it hard to eat and sleep. She felt as if she had lost control over herself and started to hate herself and isolate. She was in disbelief that the assault had occurred. To this day, it is extremely triggering for the Plaintiff every time she is with a group of friends and they decide to take an Uber. Even getting in a car with another person is triggering for her. She has had a high increase in panic attacks since the incident that still continue to occur.

If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this response at a later time should she obtain more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 8:

Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as a result of the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 8:

To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose expert discovery at the time specified by the Court.

Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal

C. Brooks Cutter, SBN 121407
Celine E. Cutter, SBN 312622
Jennifer S. Domer, SBN 305822
CUTTER LAW P.C.

401 Watt Avenue
Sacramento, CA 95864
Telephone: (916) 290-9400
Facsimile: (916) 588-9330
Email: bcutter@cutterlaw.com
ccutter@cutterlaw.com
jdomer@cutterlaw.com

Attorneys for Plaintiff JANE ROE CL 68

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**PLAINTIFF JANE ROE CL 68'S RESPONSES
TO DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES, SET ONE**

This Document Relates to:

*Jane Roe CL 68 v. Uber Technologies, Inc., et
al.*
Case No. 3:24-cv-06669

PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**
RESPONDING PARTY: **PLAINTIFF JANE ROE CL 68**
SET NO.: **ONE**

on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or recall more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 4:

For each INJURY identified in response to Interrogatory No. 3, identify every symptom, condition, OR manifestation that YOU believe YOU have experienced as a result of that INJURY AND when YOU first experienced each symptom, condition, OR manifestation, INCLUDING whether YOU ever experienced that symptom, condition, OR manifestation before the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff objects to Interrogatory No. 4 to the extent that it requires a legal conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client privilege and/or the attorney work-product doctrine.

Plaintiff further objects to the extent that this Request seeks, prematurely, expert materials and/or opinions, as doing so impermissibly intrudes upon her counsel's work product.

Plaintiff further objects that case specific discovery has just begun, and as such this request may be premature.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Plaintiff suffered significant mental health injuries as a result of the assault. Plaintiff no longer feels safe utilizing rideshare services, which was her primary form of transportation, and feels significantly more scared and anxious in her daily environment. To this day, Plaintiff continues to feel unsafe in cars with strangers; has deep trust issues around men that negatively impact her relationships with the opposite sex, including her personal and romantic ones; is negatively and significantly triggered by particular smells reminiscent of the Uber driver who assaulted her; and has experienced a noticeable and sustained loss of personal dignity. These are all conditions that arose immediately after the assault and continue still. Plaintiff was so traumatized that she missed work for two days after the assault and ultimately shifted employment so that she would not have to continue utilizing rideshare services for daily transport.

If Defendants believe further data is relevant and subject to production, Plaintiff is willing to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or

1 recall more responsive, nonprivileged, relevant information.

2 **INTERROGATORY NO. 5:**

3 If ANY MEDICAL PRACTITIONER has advised YOU that YOU may require future OR
4 additional treatment for ANY INJURIES that YOU attribute to the ALLEGED INCIDENT, state, for each
5 INJURY:

- 6 a. The name, address, AND phone number of the MEDICAL PRACTITIONER who advised
7 YOU;
8 b. The illness, condition, OR INJURY for which future treatment was discussed; AND
9 c. The nature, duration, AND estimated cost of the discussed future treatment.

10 **RESPONSE TO INTERROGATORY NO. 5:**

11 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

12 University Medical Center Brackenridge, 601 E. 15th Street, Austin, TX 78701, (512) 324-7000.
13 The doctor recommended psychiatric care for Plaintiff for symptoms of PTSD from which she was
14 suffering stemming from the assault.

15 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
16 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
17 response at a later time should she obtain more responsive, nonprivileged, relevant information.

18 **INTERROGATORY NO. 6:**

19 IDENTIFY ANY MEDICAL PRACTITIONER who has diagnosed, examined, AND/OR
20 provided YOU with ANY psychological, psychiatric, OR other mental health treatment, at ANY time
21 prior to AND/OR following the ALLEGED INCIDENT INCLUDING (a) ANY such MEDICAL
22 PRACTITIONER'S full name, address, AND telephone number; (b) the date(s) when YOU were
23 diagnosed, examined, AND/OR treated; AND (c) the INJURY, condition, illness, etc. for which YOU
24 were diagnosed, examined, AND/OR treated.

25 **RESPONSE TO INTERROGATORY NO. 6:**

26 Plaintiff objects to this Request on the grounds that the interrogatory is overbroad as to time and
27 scope; disproportionate to the needs of the case; unduly burdensome to the point of being harassing and
28 oppressive; and seeks information that is neither relevant nor likely to lead to the discovery of relevant

1 information.

2 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
3 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
4 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
5 remotely connected to the ALLEGED INCIDENT.

6 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
7 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
8 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
9 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
10 the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-
11 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
12 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
13 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
14 privacy interests, disclosure of highly confidential and sensitive medical information should only be
15 compelled where the documents concern those specific conditions the litigant has put directly at issue.

16 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
17 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
18 privilege.

19 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
20 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

21 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

22 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
23 contains and discloses the requested information.

24 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
25 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
26 obtain more responsive, nonprivileged, relevant information.

27 **INTERROGATORY NO. 7:**

28 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,

1 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
2 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

3 **RESPONSE TO INTERROGATORY NO. 7:**

4 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

5 Plaintiff no longer feels safe utilizing rideshare services (previously her primary form of
6 transportation); feels significantly more scared and anxious in her daily environment as she goes about
7 her usual routines; feels unsafe in cars with strangers; has deep trust issues around men that negatively
8 impact her relationships with the opposite sex, not just with strangers out in public but in her personal
9 life as well, negatively impacting how she interacts with her brothers, male friends, and romantic
10 partners; is negatively and significantly triggered by particular smells reminiscent of the Uber driver
11 who assaulted her, causing her to avoid being near to people for fear of encountering those smells; and
12 in her daily life feels a noticeable and sustained loss of personal dignity. Plaintiff no longer feels as safe
13 out in the world as she did before, which fundamentally impacts her daily life.

14 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
15 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
16 response at a later time should she obtain more responsive, nonprivileged, relevant information.

17 **INTERROGATORY NO. 8:**

18 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
19 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
20 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
21 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
22 a result of the ALLEGED INCIDENT.

23 **RESPONSE TO INTERROGATORY NO. 8:**

24 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
25 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
26 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
27 expert discovery at the time specified by the Court.

28 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal